



To: Kamyar Guivetchi, DWR, Michael Perrone, DWR, Jennifer Koiford, DWR

CC: B160 Advisory Committee Members

From: Ann Hayden

Date: October 29, 2004

Subject: Recommendations regarding scenarios and application of environmental water "demands" in the State Water Plan Update.

Thank you for the opportunity to provide comments on the substance, direction, and role of environmental water use, including unmet objectives, for the State Water Plan update. We appreciated the opportunity to discuss this issue with DWR staff last August 17, and would now like to provide comments on how the Plan can more clearly address environmental water use. We recognize and appreciate the progress made in addressing unmet environmental objectives in the Plan, and we hope the material can be more clearly presented and incorporated into the various scenarios. In this memo, we provide recommendations for how this material can best be incorporated in the current structure of the Plan.

Past State Water Plans have not adequately addressed unmet environmental objectives. Last year Environmental Defense, at DWR's request, analyzed certain locations where flow and water delivery objectives for environmental uses were identified as unmet. Our findings are outlined in the attached memo, "Quantification of Unmet Environmental Objectives in State Water Plan 2003 using actual flow data for 1998, 2000, and 2001." The memo clearly states that the analysis was conducted for a limited set of environmental objectives, and recommends that DWR conduct a more comprehensive analysis of environmental objectives throughout California. The results from our analysis are *not* to be interpreted as the outcome of a comprehensive assessment. Therefore, the use of our estimates in the Plan must be accompanied with a clear statement of their limited scope.

It is particularly important to acknowledge the limited nature of our analysis since it appears our estimates will be used to represent environmental demand in the "Quantified Narrative Scenarios" for Chapter 3. In addition, it is necessary to clarify that environmental objectives (or "Environmental Demand") and environmental uses are two different things. To this end, the "Initial Conditions" should include both current

environmental uses and current environmental objectives, and therefore indicate current unmet objectives as well. It should be clearly stated in the Plan that a more comprehensive analysis of objectives would likely result in a higher level of environmental demand. Likewise, it should be emphasized that in the future these environmental objectives may change in one direction or another, but it might be too speculative to suggest the direction of any such changes at this time.

In the draft text we reviewed, the scenarios are not clearly defined. If the Plan is to be a useful document, it is imperative that readers understand what each scenario represents.

Based on our understanding of what the scenarios represent, we provide the following recommendations for both better describing the scenarios and characterizing environmental demands:

- The “Current Trends” scenario should represent a future if the present trend continues. Under this scenario, environmental objectives (on a limited set of streams and wetlands) would not change, but only one half (50%) of the environmental objectives would be achieved.
- The “Resource Sustainability” scenario should represent a future with a greater level of environmental protection. Under this scenario, objectives (on a limited set of streams and wetlands) would not change and 100 percent of the environmental objectives would be achieved.
- The “Resource Intensive” scenario should represent a future with less water available to the environment. Under this scenario, neither the current environmental objectives (on a limited set of streams and wetlands) nor the degree to which they are met would change.

Adopting these recommendations and incorporating the suggested clarifications will, in our opinion, result in a much more transparent, accurate, and useful State Water Plan. We look forward to continuing to work with your staff to help improve the Plan.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ann Hayden".

Ann Hayden  
Water Resource Analyst